

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

JENNIFER SHAWGO, an individual,
JENNIFER SHAWGO BC LLC, a
Minnesota limited liability company,
MOLLY BJORNIE, an individual,
MOLLY BJORNIE, LLC, a Minnesota
limited liability company, AYESHA
DAWLEY, an individual, DAWLEY,
LLC, a Minnesota limited liability
company, CAITY PIKE, an individual, on
behalf of themselves and all others
similarly situated,

Case No. 24-cv-00556 (PJS/TNL)

**DEFENDANTS COUNTER
BRANDS, INC., G2G NEWCO, INC.,
AND SUSAN GREGG RENFREW'S
MOTION TO COMPEL
ARBITRATION AND STAY
PROCEEDINGS, OR TO DISMISS,
STRIKE, OR TRANSFER**

Plaintiffs,

v.

COUNTER BRANDS, LLC d/b/a
BEAUTYCOUNTER, a Delaware limited
liability company, THE CARLYLE
GROUP INC., a Delaware corporation,
COUNTER BRANDS, INC. d/b/a
BEAUTYCOUNTER, a Delaware
corporation, G2G NEWCO, INC. d/b/a
BEAUTYCOUNTER, a Delaware
corporation, and SUSAN GREGG
RENFREW, an individual,

Defendants.

Defendants Counter Brands, Inc., G2G Newco, Inc., and Susan Gregg Renfrew (“Defendants”), by and through their undersigned counsel, hereby move the Court for an order granting Defendants’ Motion to Compel Arbitration and Stay Proceedings, or to Dismiss, Strike, or Transfer. This motion is made pursuant to Federal Rules of Civil

Procedure 12(b)(2), 12(b)(3), 12(b)(6), and 12(f), 28 U.S.C. § 1404(b), and the Federal Arbitration Act. This motion is supported by all files, records, and proceedings herein, including Defendants' supporting memorandum of law, exhibits, and the arguments of counsel.

Dated: August 16, 2024

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Brands, Inc.*